

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Crim. No. 04-30046-MAP

UNITED STATES OF AMERICA

v.

PASQUALE ROMEO, ET AL
Defendants

MOTION OF DEFENDANT PASQUALE ROMEO
FOR ENLARGEMENT OF TIME

Defendant Pasquale Romeo respectfully requests that the time for filing his motion regarding the loss calculation for purposes of his sentencing be enlarged to July 28, 2006. The grounds for this motion are as follows:

1. Mr. Romeo's sentencing is scheduled for October 5, 2006.
2. The issue of loss is a complex and task rich issue requiring Registry of Deed searches involving nearly 100 separate properties.
3. Pursuant to the Court's and government's request in open court at the time of Mr. Romeo's plea, undersigned counsel and counsel for co-defendant are making meaningful efforts to co-ordinate a consistent and to the extent possible, agreed upon presentation to the court on the issue of loss.
4. Additional time is required to continue that process and achieve that end. Counsel understands that similar motions have been filed by co-defendants and the government has not objected to the motions.

WHEREFORE, the Defendant Pasquale Romeo respectfully requests that the

Court enlarge the time to file said motion to July 28, 2006.

THE DEFENDANT
By His Attorney

/s/ Michael O. Jennings
Michael O. Jennings, Esq.
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CERTIFICATE OF SERVICE

I, Michael O. Jennings, hereby certify that I served a copy of the foregoing motion to all parties of record on May 25, 2006.

/s/ Michael O. Jennings
Michael O. Jennings